

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

LOUISE TRAUMA CENTER LLC.,

Plaintiff,

v.

UNITED STATES CITIZENSHIP AND
IMMIGRATION SERVICES,

Defendant.

Case No. 1:22-cv-01917-JKB

UPDATED JOINT STATUS REPORT

Pursuant to the Joint Status Report dated October 24, 2022, the parties report as follows:

1. Plaintiff has dismissed the First Cause of Action and reports that he is satisfied with the responses on Cause of Actions Four and Six.
2. For Cause of Action Two, USCIS re-processed a document where Plaintiff was seeking the name of the reporter and released the re-processed page to Plaintiff with delivery confirmed on January 23, 2023.
3. For Cause of Action Three, Plaintiff posed several questions regarding the pages provided in response to this item. The NRC conducted another search to determine if there were documents responsive to Plaintiff's questions. The NRC located documents, but they are outside the search cut-off date for the request. Nonetheless, in the interest of resolving the litigation, USCIS will process these additional pages and anticipates issuing a release by/on March 7, 2023.
4. With regard to Cause of Action Five, the final consultation regarding the State Department was completed and the pages were sent to Plaintiff with delivery confirmed on January 30, 2023.

5. In accordance with the Order of the Court dated October 24, 2022, the parties agree to file either (1) a joint motion to dismiss the case with prejudice or (2) notice that it is not possible to file such notice and a motion requesting further status/scheduling conference with the Court, on or before March 15, 2023.

Respectfully submitted,

EREK L. BARRON
United States Attorney

/s/
David L. Cleveland (Bar. No. 13559)
(Signed with permission)
1220 L. Street NW #100
Washington, DC 20005
202-812-8684
1949.david@gmail.com
Counsel for Plaintiff

/s/
Beatrice C. Thomas (Bar No. 21969)
Assistant United States Attorney
36 South Charles Street, 4th Floor
Baltimore, Maryland 21201
410-209-4848
beatrice.thomas@usdoj.gov
Counsel for Defendant